

Flores, Priscilla (Feliciano)

From: Davidj Gray <gray.davidj@epamail.epa.gov>
Sent: Wednesday, September 24, 2014 1:47 PM
To: Gray, Davidj
Subject: Fw: International Salt
Attachments: Triton-ISCO Charlestown NPR.doc; ATTXLXTZ.doc

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David J. Gray, P.E.  
Office of Ecosystem Protection  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Ste. 100 (OEP06-1)  
Boston, MA 02109-3912

Phone: 617.918.1577  
eFax: 617.918.0577  
gray.davidj@epa.gov

----- Forwarded by Davidj Gray/R1/USEPA/US on 09/24/2014 01:46 PM -----

From: Davidj Gray/R1/USEPA/US  
To: Davidj Gray/R1/USEPA/US  
Date: 08/19/2014 02:29 PM  
Subject: International Salt

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~~~~~  
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----- Forwarded by Davidj Gray/R1/USEPA/US on 08/19/2014 02:28 PM -----

From: Davidj Gray/R1/USEPA/US
To: David Webster/R1/USEPA/US@EPA
Date: 07/29/2010 07:24 AM
Subject: International Salt NPR

Hi Dave,

Attached is a draft letter responding to a permitting determination letter request from International Salt. It's a pretty straightforward response, but I just wanted to check two things:

1) Do you want to be the signatory (the letter came directly to me)?

2) Are you aware of any new internal concerns or desire to scrutinize salt pile operators or look at potential designation? I can also check with Lynne or Johanna with respect to the Mystic initiative - but I assume the salt piles are not included as an action item, save for public concerns over covering to prevent wind-blown materials, esthetics, and general operations.

n.b. ISCO has also submitted an identical request letter for its Portsmouth, NH facility for which I'll prepare a similar response

(See attached file: Triton-ISCO Charlestown NPR.doc)

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From: David Webster/R1/USEPA/US
To: Davidj Gray/R1/USEPA/US@EPA
Date: 07/29/2010 10:33 AM
Subject: Re: International Salt NPR

Dave,

I'm inclined to add a sentence addressing the what could happen in the future should EPA determine there the discharge contributes to a violation of a water quality standard or is a significant contributor of pollutants to waters of the United States. Also, are they subject to the BMPs in the Boston Autoport MSGP? If so, can we point out some of the BMPs and cc Boston Autoport on the letter. What do you think.

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▼ Davidj Gray---07/29/2010 07:24:25 AM---Hi Dave,

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From: Davidj Gray/R1/USEPA/US
To: David Webster/R1/USEPA/US@EPA
Date: 07/29/2010 03:25 PM
Subject: Re: International Salt NPR

Hi Dave,

I originally had such 'in the future...' language in the letter but removed it in favor of the much simpler "at this time..." language. I think the potential future permitting language is more appropriate to use in those instances where a facility use to have a permit and there is a chance that operations could be reinitiated or changed, thus necessitating coverage; or a where citizen involvement or a request for designation is involved. Regardless, I can add back in some appropriate language.

The Autoport (who is actually a tenant of MassPort) has overall site coverage under its 2008 MSGP. Also, though Triton states in its letter that the Port of Portsmouth has overall site coverage under the MSGP - our database shows no such coverage for the port. I believe Triton is assuming this to be the case or maybe they are confusing it with the City of Portsmouth's MS4 Permit. With respect to site controls - Triton has described that BMPs are employed at both ISCO facilities, but also admits there is potential that stormwater discharged from the sites could come in contact with the salt piles.

Operators authorized under the 2008 MSGP have the obligation to identify locations of on-site salt piles, and enclose or cover salt piles and implement measures to minimize exposure during loading/unloading operations. In addition, EPA considers as regulated stormwater run-on that commingles with stormwater discharges associated with the operator's industrial activities; requiring operator's to identify locations and sources of run-on from adjacent property that contains significant quantities of pollutants. Therefore, the implication is that an operator is responsible for tenant or off-site activities that are not otherwise covered by their own NPDES permit. In the case of the Charlestown facility, the Boston Autoport should comply by incorporating the above in its SWPPP and including some type of compliance clause with ISCO in its sublease. With respect to Portsmouth - I'll first need to do some more research to learn if the port has (or should have) MSGP coverage.

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From: David Webster/R1/USEPA/US
To: Davidj Gray/R1/USEPA/US@EPA
Date: 07/30/2010 08:54 AM
Subject: Re: International Salt NPR

Let's try to discuss today.

1. ways to ensure the Autoport SWPPP contains the BMP provisions you describe
 2. coordination with and/or deferral to the Mystic Initiative and/or enforcement
- DW

▼ Davidj Gray---07/29/2010 03:25:53 PM---Hi Dave,

From: Davidj Gray/R1/USEPA/US

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